

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

*In Re* Petition of Marginalised Affected Property  
Owners,  
*Applicant,*

Civil Action No. 1:21-mc-00681

For an Order Granting Leave to Issue Subpoenas To  
BSG Resources Ltd., Alvarez & Marsal Holdings,  
LLC, and Cleary Gottlieb Steen and Hamilton LLP  
for Taking of Discovery Pursuant to 28 U.S.C. § 1782

**PETITION OF MARGINALISED AFFECTED PROPERTY OWNERS, PURSUANT TO  
28 U.S.C. § 1782, FOR LEAVE TO ISSUE SUBPOENAS FOR TAKING OF DISCOVERY  
FOR USE IN A FOREIGN PROCEEDING**

Applicant Marginalised Affected Property Owners respectfully petitions this Court, pursuant to 28 U.S.C. § 1782, for an Order granting Applicant leave to issue subpoenas to obtain discovery from Respondents BSG Resources Ltd., Alvarez & Marsal Holdings, LLC, and Cleary Gottlieb Steen and Hamilton LLP. Section 1782(a) provides: “The district court of the district in which a person resides or is found may order him to give his testimony or statement or to produce a document or other thing for use in a proceeding in a foreign or international tribunal...upon the application of any interested person...” 28 U.S.C. § 1782. Applicant seeks this discovery for use in pending proceedings in Sierra Leone in which Applicant is a plaintiff. Applicant’s narrow requests are directly related to the pending foreign proceedings.

This Petition is based upon the accompanying memorandum of law and supporting exhibits.

Dated: August 19, 2021

Respectfully submitted,

/s/LINDSAY A. BAILEY

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